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Date: Wednesday, August 20, 2003

Total Pages: 3

Subject: Proceeding #03-104

Name:

Company: Federal Communications Commission

Voice Number:

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SEP 17 2003

Federal Communications Commission  
Office of the Secretary

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No. of Copies Rec'd \_\_\_\_\_  
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August 19, 2003  
**Proceeding #03-104**

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We are submitting a comment in reply to HomePlug Powerline Alliance.

First, we would like to let it be known that we are opposed to the introduction of Broadband Power Line (BPL) transmission of data. This likely is the most serious threat, not only to Amateur Radio but to all communications in the HF and low VHF range.

As we all know, bare wires are antennas. They radiate radio frequency. The long-wire antenna is regarded and proven to be a very effective radiator. The adage, "The longer, the better" still holds true when an Amateur operator wants a simple, effective, and low-cost antenna. Power lines fit that bill perfectly.

As we look at the comments filed by the power companies and their allies, we see that the fact (now demonstrated by the American Radio Relay League) that BPL will pollute the RF atmosphere is ignored or glossed over, by using the cliché, the requirements in Part 15 have been effective in protecting against interference to licensed services, and so there is no need for additional Part 15 regulations.

Even HomePlug Powerline Alliance, a financial ally to the power companies in the BPL issue, alludes to the idea that interference will be problematic. While they chant the mantra of existing Part 15 requirements being adequate in protecting licensed services, they divorce themselves from the interference they know will occur. On page 6 of their filing, they state, "Devices inside the home may well have different interference potential than devices mounted outside on the electricity distribution infrastructure, and regulations should treat these situations accordingly." In other words, HomePlug products will not be the cause of the interference. The power companies will be.

HomePlug also places the onus on DSL or cable modem services to ensure that (hopefully) there will be no interference between HomePlug and those other services. On page 7, HomePlug states, "...cable modems use shielded cables, and this ensures there

will be no interference between HomePlug devices and ... cable modems." Translated, that means, "HomePlug will not interfere with cable, because the cable companies shield their conductors.

So, even the allies of BPL indirectly acknowledge that their products will radiate signals that will interfere with other services and electronic devices. Of course, if BPL is allowed to go forth as planned, the public will cry out for relief when they can no longer use their AM, FM and television receivers. When that happens, the BPL solution will be, "Not to worry: we can provide all those services. You don't need over-the-air television and radio anymore," thus forcing everyone to buy their product. There will be no solution for Amateur Radio, public safety radio, MARS, ARES, RACES, and military communications.

We strongly urge the Commission **not** to allow BPL to proceed as it is. It is unnecessary, and it is dangerous to the American Public.